

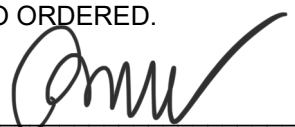


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September 21, 2022

VIA ECF

Honorable Philip M. Halpern
United States District Judge
Federal Building and Court House
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

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| <p style="text-align: right;">STEPHEN NATHAN WILLIAMS</p> <p>Application granted. The revised Rule 56.1 Statement, pre-motion letter, and response to pre-motion letter due 10/7/2022.</p> <p>SO ORDERED.</p>  <p>Philip M. Halpern United States District Judge</p> <p>Dated: White Plains, New York September 22, 2022</p> |
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Re: Marshall v. Waldron, 7:16-cv-8622 (PMH) – Joint Request for Extension of Time

Dear Judge Halpern:

This firm is co-counsel for Plaintiff Anthony Marshall in the above matter. On behalf of all parties, I am writing respectfully to request a two-week extension of the time for submission of a revised Rule 56.1 statement.

On September 6, 2022, Defendants submitted a pre-motion letter for summary judgment together with a Rule 56.1 statement and Plaintiff's responses thereto. *See* Dkt. 206. On September 7, 2022, the Court directed the parties to meet and confer and to file a revised Rule 56.1 statement by September 23, 2022. *See* Dkt. 207.

Counsel for the parties have met and conferred and are working cooperatively to narrow the scope of factual disputes that would be presented to the Court at summary judgment. Accordingly, the parties respectfully and jointly request that the deadline be extended by two weeks, until to October 7, 2022, to permit the parties opportunity to continue their efforts to narrow outstanding disputes and to prepare a revised Rule 56.1 statement.

Defendants' counsel has approved of this letter prior to its submission to the Court.

Respectfully submitted,

/s/ Stephen Nathan Williams

Stephen Nathan Williams
Counsel for Plaintiff